

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**C. M. COLLINS, N. J. LUNDY and R. C. L. MAYS, individually and on behalf of all others similarly situated,**

*Plaintiffs,*

**VS.**

**CATASTROPHE RESPONSE UNIT,  
INC. and CATASTROPHE RESPONSE  
UNIT USA, INC.,**

***Defendants.***

**CIVIL ACTION NO. 4:22-cv-1073**

## **ORDER GRANTING DEFENDANTS’ MOTION TO COMPEL DISCOVERY**

Before the Court is Defendants Catastrophe Response Unit USA, Inc.’s and Catastrophe Response Unit, Inc.’s (collectively, “CRU”) Amended Motion to Compel Discovery (the “Motion to Compel”). After consideration of the Motion to Compel and the relevant evidence, the Court finds that the Motion to Compel should be **GRANTED**.

It is therefore **ORDERED** that:

- (i) Plaintiffs Carla Collins (“Collins”), Nikki Lundy (“Lundy”), Rasheedah Mays (“Mays”), Pamela James (“James”), Jill Mansfield (“Mansfield”), Sheena Nickelberry (“Nickelberry”), Basil Leo Riley, III (“Riley”), Ashley Ruise (“Ruise”) and Tammy Russell-Brown (“Russell-Brown”) (collectively, “Plaintiffs”) shall, within 10 days of this Order, produce all of the résumés that they have used in the last five years.
- (ii) Riley’s objection to CRU’s Request for Production No. 8 is overruled.

- (iii) Riley shall, within 10 days of this Order, produce his paystubs for payments he received from July 1, 2021 through September 30, 2022.
- (iv) Collins', Lundy's, and Mays' objections to CRU USA's Request for Production No. 18 are overruled.
- (v) James', Mansfield's, Nickelberry's, Riley's, Ruise's and Russell-Brown's to CRU USA's Request for Production No. 13 are overruled.
- (vi) Mays and Russell-Brown shall, within 10 days of the date of this Order, produce either: (a) all of their Forms W-2 and 1099 from 2019 to the present; or (b) their Wage and Income Transcripts from 2019 to the present.
- (vii) Nickelberry shall, within 10 days of the date of this Order, produce either: (a) all of her Forms W-2 and 1099 from 2020; or (b) her Wage and Income Transcript from 2020.
- (viii) Mansfield shall, within 10 days of the date of this Order, produce either: (a) all of her Forms W-2 and 1099 from 2022, or (b) her Wage and Income Transcript from 2022.
- (ix) Plaintiffs shall, within 10 days of the date of this Order, produce unredacted copies of all of their tax returns or Tax Return Transcripts from 2019 to the present. For any year in which a Plaintiff did not file a tax return, he/she must produce a Verification of Nonfiling Letter.
  - a. For any tax return/Tax Return Transcript during this time period that a Plaintiff claims he/she does not have in his/her possession or custody, the Plaintiff must order his/her tax return or Tax Return Transcript directly from the Internal Revenue Service, and, within three days of his/her receipt of

that tax return/Tax Return Transcript, produce it to CRU.

b. For any tax return during this time period for which a Plaintiff filed an amended tax return, and that Plaintiff claims he/she does not have the amended tax return in his/her possession or custody, that Plaintiff must order his/her amended tax return directly from the IRS, and, within three days of his/her receipt of that tax return, produce an unredacted copy of the amended tax return to CRU.

(x) Collins shall, within 10 days of the date of this Order, produce, for each and every Facebook account that she managed on a day between July 9, 2021 and October 31, 2022, on which she claims to have performed work for CRU, all of the items under each of the following subfolders under Collins' Facebook Activity Log, in HTML format: (i) Your Posts; (ii) Messages; (iii) Comments and reactions; (iv) Stories; (v) Groups; (vi) Pages; (vii) Events; and (viii) Other activity. These Facebook accounts include, but are not limited to, the following: "Carla Collins;" "Shesus Christiana;" "Carla Marie;" "Ask Shesus;" "Katie J & Lauren Nicole;" "Carla Marie The Goddess;" and "The Rise of Shesus."

a. For any Facebook account that Collins managed on a day between July 9, 2021 and October 31, 2022, on which she claims to have performed work for CRU, but claims now that she cannot access, Collins shall, within 10 days of the date of this Order, produce screenshots showing that she has completed each of the steps on Facebook listed under the "Recover an old Facebook account you can't log into."

- b. The Court would remind Collins that there is a Protective Order in place. Nevertheless, Plaintiffs' counsel may designate Collins' Facebook direct messages containing the names of domestic violence victims as Attorneys' Eyes Only pursuant to an agreed-upon provision by the parties. In the alternative, Plaintiffs' counsel may redact the names of persons whom Collins claims are domestic violence victims contained in Collins' Facebook direct messages.
- (xi) Mays shall, within 10 days of the date of this Order, amend her specific denial to CRU's Request for Admission No. 2 and any other of her discovery responses that did not actually come from Mays.

**SO ORDERED.**